

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
CROWN CLOTHING CORPORATION,)	
Plaintiff)	
)	
v.)	CIVIL ACTION NO. 05-10049(NG)
)	
RANDCORE, INC.,)	
RAND INTERNATIONAL TRADING,)	
INC., ANDRE BERNARD, AND)	
RONALD BERNARD,)	
Defendants)	
_____)	

REVISED JOINT STATEMENT OF THE PARTIES
CONCERNING PRETRIAL SCHEDULE

In preparation for the Scheduling Conference rescheduled to October 6, 2005, and in accordance with the Court's instruction and pursuant to Local Rule 16.1, counsel for all of the parties have conferred and agree upon the following proposed pretrial schedule:

A. Proposed Discovery Plan and Schedule for Motions

1. Initial Disclosures. Each defendant shall serve not later than October 28, 2005, his/its Initial Disclosures pursuant to Federal Rules of Civil Procedure 26 (a)(1).

2. Production of Documents by Defendants. Each of the defendants Randcore, Inc., Rand International Trading, Inc., Andre Bernard, and Ronald Bernard will serve their Responses to the First Request of the Plaintiff Crown Clothing Corporation for Production of Documents by Each Defendant dated December 7, 2004 (served on each defendant with the Summons and Complaint in this action) not later than October 24, 2005 and shall thereafter promptly begin the production of Bates

numbered copies of the documents requested in the Request and the documents required to be identified or produced by Federal Rules of Civil Procedure 26 (a)(1)(B) and (C). The defendants will complete their production of documents not later than November 8, 2005 at 1:00 PM.

3. Deposition of Andre Bernard. The deposition of the defendant Andre Bernard shall be taken at the office of plaintiff's counsel in Boston on November 15 and 16, 2005 starting at 9:00 AM.

4. Close of Fact Discovery. All fact discovery shall be completed by February 3, 2006.

5. Experts.

a. Plaintiff shall submit the reports of its expert witnesses on or before December 1, 2005.

b. Each defendant shall submit the reports of its/his expert witnesses on or before January 3, 2006.

c. Plaintiff shall submit any rebuttal expert reports by February 3, 2006.

d. All expert discovery shall be completed by March 3, 2006.

8. Motions. All dispositive motions shall be served and filed on or before March 24, 2006.

B. Certifications. Counsel and an authorized representative of the Defendants Randcore, Inc., Rand International Trading, Inc., and Andre Bernard will file their certifications in accordance with Local Rule 16.1(D)(4) prior to the October 6, 2005 Scheduling Conference.

/s/ Ryan M. MacDonald

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Dated: October 5, 2005

CERTIFICATE OF SERVICE

I, Ryan M. MacDonald, hereby certify under the pains and penalties of perjury that on October 5, 2005, I served a copy of this ***Revised Joint Statement of the Parties Concerning Pretrial Schedule*** electronically to Jeffrey S. Stern, Esq. and Annapoorni R. Sankaran, Esq. and by first class mail, postage prepaid to:

Gary R. Greenberg, Esq.
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Boston, MA 02110

/s/ Ryan M. MacDonald

Ryan M. MacDonald